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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JOHN DOE I, et al., on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 3:23-cv-02431-VC

**JOINT STIPULATION AND  
~~PROPOSED~~ ORDER EXTENDING  
ANSWER AND DISCOVERY  
DEADLINES; AND [PROPOSED]  
ORDER**

Consol. Compl. Filed: July 13, 2023  
SAC Filed: August 12, 2024

District Judge Vince Chhabria  
San Francisco Courthouse, Ctrm. 4

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs John Doe, et al., and Defendant Google LLC (together, the “Parties”), by and through their respective counsel, hereby stipulate and agree to the following, subject to the Court’s approval:

WHEREAS on March 14, 2024, the Court stayed discovery pending a ruling on a motion to dismiss (ECF 119);

WHEREAS on June 6, 2025, the Court issued an Order Granting in Part, Denying in Part, Motion to Dismiss Second Amended Complaint (ECF 198);

WHEREAS pursuant to Fed. R. Civ. P. 12(a)(4)(A) Google has 14 days after the issuance of the order to serve an answer, setting its deadline to do so on June 20, 2025;

WHEREAS the Parties agree that in the interest of the orderly and efficient conduct of this case, Google’s time to file an answer, and the Parties’ time to respond to initial set of written discovery responses, as well as service of Initial Disclosures, should be set to July 21, 2025;

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties, and subject to the Court’s approval, that:

1. The deadline for Google to file an answer is extended to July 21, 2025.
2. The deadline for Google to serve written responses to Plaintiffs’ first set of Requests for Production, dated December 18, 2023, is extended to July 21, 2025. For the avoidance of doubt, Plaintiffs’ December 18, 2023, Requests for Production supersede those that certain Plaintiffs served prior to the consolidation of actions on June 8, 2023, to which no response will be made.
3. The deadline for Plaintiffs to serve written responses to Google’s first set of Requests for Production, dated March 8, 2024, is extended to July 21, 2025.
4. The deadline for the Parties to serve Initial Disclosures pursuant to Fed. R. Civ. P. 26(a)(1) is extended to July 21, 2025.

**IT IS SO STIPULATED.**

Dated: June 19, 2025

**COOLEY LLP**

By: Joshua Anderson

Benedict Hur  
Simona Agnolucci  
Eduardo Santacana  
Joshua Anderson  
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Attorneys for Defendant Google LLC

Dated: June 19, 2025

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Attorneys for Plaintiffs and Proposed Class

**ATTESTATION**

Pursuant to Civil Local Rule 5-1(h)(3), I attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: June 19, 2025

By: Jay Barnes  
Jay Barnes

**~~PROPOSED~~ ORDER**

Pursuant to stipulation, the Court hereby ORDERS as follows:

Google's deadline to file an answer to the complaint is extended to July 21, 2025.

Google's deadline to serve written responses to Plaintiffs' first set of Requests for Production, dated December 18, 2023, is extended to July 21, 2025.

Plaintiffs' deadline to serve written responses to Google's first sets of Requests for Production, dated March 8, 2024, is extended to July 21, 2025.

The Parties' deadline to serve Initial Disclosures pursuant to Fed. R. Civ. P. 26(a)(1) is extended to July 21, 2025.

The parties may further extend these discovery deadlines by agreement.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: June 20, 2025

BY: 

Hon. Vince Chhabria  
United States District Judge